

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

C.A. No. 04-30177-KPN

JOEL PENTLARGE,

Plaintiff,

vs.

ROBERT MURPHY,
KATHLEEN DENNEHY,
THE MASSACHUSETTS DEPARTMENT OF CORRECTION
NATALYA PUSHKINA, AND
DEBORAH O'DONNELL,

Defendants.


PLAINTIFF'S MOTION TO SUPPLEMENT THE COMPLAINT

The plaintiff Joel Pentlarge moves to supplement the complaint as provided by Federal Rule of Civil Procedure 15(d). In support of this motion the plaintiff states that there have been further instances in which the defendants have violated the plaintiff's civil rights since the filing of the complaint. These new claims for denial of a request for an emergency escorted furlough to go to the funeral of the plaintiff's brother in violation of the defendant's regulations, and interference with the plaintiff's incoming and outgoing mail, including mail directly related to the prosecution of this case, arise from the civil commitment of the plaintiff, as do all of the claims previously raised by the plaintiff. Filed with this motion is the proposed Supplemental Complaint, which has been verified under the pains and penalties of perjury. Allowing this motion to supplement the complaint will promote the economical and speedy disposition of these controversies. Keith v. Volpe, 858 F.2d 467, 473-474 (9th Cir. 1988 cert den. 493 U.S. 813, su nom. Hawthorne v.

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v. Wright) citing inter alia, J. Moore, Moore's Federal Practice, ¶ 15.16[3] (1985), and C. Wright & A. Miller, Federal Practice and Procedure, § 1506 (1971).


Joel Pentlarge, Plaintiff


Joel Pentlarge, Pro Se
Nemasket Correctional Center
30 Administration Rd.
Bridgewater, MA 02324
Telephone (413) 967-3453

Verification

I, Joel Pentlarge, state under the pains and penalties of perjury that all of the factual statements in the foregoing motion to supplement the complaint are true.

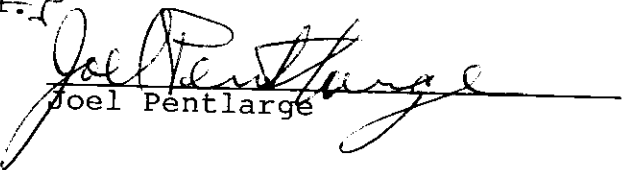
September 26, 2004


Joel Pentlarge

Certificate of Service

I, Joel Pentlarge, state under the pains and penalties of perjury that I have served a copy of the foregoing motion to supplement the complaint by first class mail postage prepaid Robert Murphy, Natalya Pushkina, and Deborah O'Donnell at the Nemasket Correctional Center, 30 Administration Rd., Bridgewater MA 02324, Kathleen Dennehy at the Massachusetts Department of Correction, 50 Maple Street, Milford, MA 01757, and Attorney General Thomas Reilly, One Ashburton Place, Boston, MA 02108. ~~I have also served the defendants Murphy, Pushkina, O'Donnell and Dennehy by institutional mail.~~

September 28, 2004


Joel Pentlarge